

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 24-20200-CR-ALTMAN**

**UNITED STATES OF AMERICA**

**vs.**

**NELSON GARCIA-MERA,  
a/k/a "Cubano,"  
a/k/a "Cuba,"**

**Defendant.**

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**STIPULATED FACTUAL BASIS FOR PLEA**

Pursuant to Rule 11(b)(3), the following sets forth the factual basis for defendant **NELSON GARCIA-MERA's** guilty plea to Count One of the Indictment, which charges the defendant with conspiracy to distribute cocaine, knowing, intending, and having reasonable cause to believe that it would be unlawfully imported into the United States, in violation of Title 21, United States Code, Section 963. The United States of America and the defendant agree that had this case gone to trial, the United States would have proven the following facts, among others, beyond a reasonable doubt:

1. From at least as early as 2018 through June 1, 2019, the defendant was part of a drug trafficking organization ("DTO") that engaged in the shipment of cocaine from the Dominican Republic to the United States, including South Florida, using recreational vessels.

2. The DTO transported four shipments of cocaine aboard the vessels "Day Dreamer" and "Triple A" from the Dominican Republic to the United States. Shipment one contained 203 kilograms of cocaine that arrived in South Florida in May 2018. Shipment two contained 330 kilograms of cocaine that arrived in South Florida in September 2018. Shipment three contained

467 kilograms of cocaine that arrived in South Florida in December 2018. Shipment four contained 281 kilograms of cocaine that arrived in South Florida in June 2019.

3. The first three shipments arrived from the Dominican Republic and docked at the MarineMax marina in Dania Beach, Florida. Records from the MarineMax marina confirm that "Day Dreamer" arrived at the marina on or about May 14, 2018, September 11, 2018, and December 17, 2018. The DTO successfully imported these three cocaine shipments, sold the cocaine, and distributed the drug proceeds amongst the DTO members. The fourth shipment arrived from the Dominican Republic on June 1, 2019, aboard the "Triple A," which docked behind a waterfront residence in North Miami, Florida, that DTO members rented in furtherance of the drug importation operation. On the same day, law enforcement conducting surveillance at the residence seized the "Triple A" and the cocaine, and arrested several DTO members.


4. As a member of the DTO, the defendant contributed funds towards purchasing the "Day Dreamer" in 2018 and the "Triple A" in 2019. The defendant shared in the profits the DTO generated from transporting other co-conspirators' cocaine from the Dominican Republic to the United States. In addition to sharing in the DTO's profits, the defendant invested his own kilograms of cocaine to be imported into the United States. The defendant purchased these kilograms of cocaine at Dominican Republic prices and profited once the kilograms were imported and sold at United States prices. Specifically, on the first "Day Dreamer" shipment, the defendant invested ten (10) kilograms of cocaine; on the second "Day Dreamer" shipment, he invested nineteen (19) kilograms of cocaine; and on the "Triple A" shipment, he invested fifteen (15) kilograms of cocaine.

5. The defendant profited from the transportation fees derived the cocaine that the DTO imported and, therefore, he is accountable for approximately 1,281 kilograms of cocaine.


The defendant was responsible for approximately \$754,000 in drug proceeds resulting from the "Day Dreamer" cocaine shipments that the DTO successfully imported and distributed in the United States.

6. The parties agree that the foregoing facts are sufficient to prove the defendant's guilt of the offense charged in Count 1 of the Indictment beyond all reasonable doubt.

Date: 10/1/24

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY  
By:   
KEVIN D. GERARDE  
ASSISTANT U.S. ATTORNEY

Date: 10/1/24

By:   
BRIAN PARWARESCH, ESQ.  
ATTORNEY FOR DEFENDANT

Date: 10/1/24

By:   
NELSON GARCIA-MERA  
DEFENDANT